

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

PAUL G. JONES, an individual,

Plaintiff,

v.

Case No. 10-cv-13114-JF
Hon. Patrick J. Duggan

PECO CORPORATION OF TROY,
d/b/a PECO CAR WASH SYSTEMS, INC

Defendant.

Brian J. Nagy (P65542)
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STIPULATED ORDER
PROTECTING CERTAIN INFORMATION

At a session of said Court held in the City of
Detroit, County of Wayne, State of Michigan on:

April 22, 2011/

PRESENT: HON. PATRICK J. DUGGAN
U.S. DISTRICT COURT JUDGE

Upon reading the signed Stipulation of the parties in the above entitled matter, and the
Court being fully advised in the premises;

IT IS HEREBY ORDERED that:

- a. Defendant has been requested to produce and during the course of discovery may

further produce, for inspection and copying, pursuant to Plaintiff's request, certain personnel and related records and information regarding its business operations, financial condition, trade secrets and employees. Such records and information shall be designated "Confidential" by the parties and subject to the terms of this Protective Order. Either party may challenge the "Confidential" designation by filing a motion with this Court.

b. Information obtained pursuant to these requests and documents, and/or copies of the documents themselves, shall be kept in the custody and care of counsel of record in this action, and shall be disclosed and used only for the purposes of the conduct of this case and for no other purpose. Information obtained pursuant to these requests and documents, and/or copies of the documents themselves, shall be disclosed by Plaintiff's counsel of record only to employees of Plaintiff's counsel of record, and/or the named Plaintiff and/or potential witnesses and consultants only to the extent essential to the preparation of this case and for no other purpose, and provided that Plaintiff's counsel shall give all such individuals a copy of this Stipulation and Protective Order and all such individuals agree to be bound by the terms of this Stipulation and Protective Order.

c. Individuals having knowledge or information obtained pursuant to these requests and documents, and/or copies of the documents themselves, by virtue of their participation in the conduct of this case shall use the information obtained from these requests and documents, and/or copies of the documents themselves, for that purpose only. Such individuals shall not disclose information obtained pursuant to these requests and documents, and/or copies of the documents themselves, to any person or persons not involved in the conduct of this case.

d. At the conclusion of this matter, all documents designated as "Confidential" produced by Defendant, including copies thereof, shall be returned to Defendant's counsel of record.

IT IS SO ORDERED.

s/Patrick J. Duggan
Patrick J. Duggan
United States District Judge

Dated: April 22, 2011

I hereby certify that a copy of the foregoing document was served upon counsel of record on April 22, 2011, by electronic and/or ordinary mail.

s/Marilyn Orem
Case Manager

APPROVED AS TO FORM AND SUBSTANCE:

By: s/ with consent of Brian J. Nagy
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